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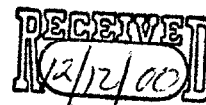
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December 4, 2000

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and Dietary Supplements (HFS-800)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
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Washington, D.C. 20204



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**NOTIFICATION OF STATEMENTS  
OF NUTRITIONAL SUPPORT**

On behalf of Starlight International, Monterey, California 93940, the undersigned files this notification pursuant to section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (FDC Act), 21 U.S.C. § 343(r)(6).

The certification required by 21 C.F.R. § 101.93(a)(3) is attached.

Brand name: LifeGuard™ Joint Formula

Dietary ingredients: manganese, glucosamine, chondroitin, methylsulfonyl methane (MSM), sulfur, turmeric (*Curcuma longa*) root, *Boswellia serrata* (trunk) extract

Statements of nutritional support:

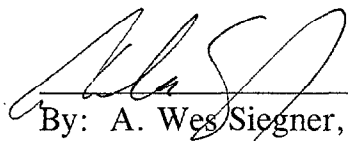
- Increases joint flexibility
- Helps maintain the cushioning effect that joints need for optimal mobility, joint comfort and range of motion
- Helping to strengthen cartilage and increase the natural lubricating fluid around joints

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- Helps keep normal joint space
- Helps to maintain and strengthen healthy joint function
- Glucosamine helps build healthy cartilage and joint lubricating fluids. This promotes healthy joint function and movement
- Chondroitin sulfate acts in conjunction with glucosamine to help maintain healthy cartilage, while promoting the synthesis of new cartilage and is also shown to enhance the "shock absorbing" effect of joints by balancing fluid levels
- Methylsulfonyl methane is known for its ability to enhance flexibility by promoting cartilage synthesis and joint repair
- Deficiencies in manganese can limit the strengthening of cartilage
- Turmeric helps you to engage in vigorous exercise
- Boswellia helps preserve normal joint function
- Each of these ingredients helps to maintain, rebuild, and renew healthy joint function

Hyman, Phelps & McNamara, P.C.



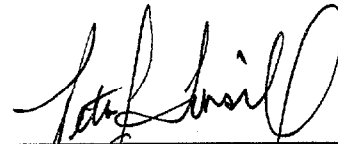
By: A. Wes Siegner, Jr.

AWS/SNR/dng

Attachment - Certification

21 C.F.R. § 101.93(a)(3) Certification

I certify that the information contained in the preceding section 403(r)(6) notice for the LifeGuard™ Joint Formula Dietary Supplement is complete and accurate, and that Starlight International has substantiation that the statements are truthful and not misleading.



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Peter Tansill  
Director of Manufacturing  
Starlight International

December 4, 2000